

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

GREGORY COLBURN et al.,

Defendants

Case No. 1:19-cr-10080-NMG

**DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL
OFFER OF PROOF**

Defendants Gamal Abdelaziz and John Wilson respectfully move this Court for leave to file under seal the exhibits to their forthcoming Offer of Proof for Evidence Excluded During Trial. Defendants' exhibits to their offer of proof will include sensitive, confidential, and personally identifiable information about USC students, Defendants, and others. Accordingly, under Local Rule 7.2, Defendants ask that the Court grant leave to file under seal the above-referenced exhibits. Defendants will publicly file the offer of proof, and so that the relevance is clear, will provide the Court and Government with under seal copies of the exhibits.

Respectfully submitted,

By their counsel

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Date: October 5, 2021

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CERTIFICATE OF COMPLIANCE WITH LOCAL RULES 7.1 AND 112.1

The undersigned counsel hereby certifies that counsel for Defendants have attempted to confer with counsel for the government and attempted in good faith to resolve or narrow the issues raised by this motion. The government has not responded to Defendants.

/s/ Lauren Papenhausen

Lauren Papenhausen

CERTIFICATE OF SERVICE

I hereby certify that the above document is being filed on the date appearing in the header through the ECF system, which will send true copies to the attorneys of record.

/s/ Lauren Papenhausen

Lauren Papenhausen